

MEMO

NEW JERSEY STATE DEPARTMENT OF ENVIRONMENTAL PROTECTION

TO Moxon Tan

FROM Robert Plumb

DATE July 26, 1979

SUBJECT L. E. Carpenter & Company, 170 North Main Street, Wharton, NJ

On July 25, 1979 a meeting was held at L. E. Carpenter & Company, 170 North Main Street, Wharton, NJ. In attendance were the following:

Peter T. Lynch, N.J.D.E.P.
Moxon Tan, N.J.D.E.P.
Robert Plumb, N.J.D.E.P.
Patricia Skelly, N.J.D.E.P., Office of Regulatory Affairs
George Klepp, N.J.D.E.P.
F. Jay Singleton, L. E. Carpenter, President
Henry Jarrett, L. E. Carpenter, Plant Engineer
Theodore A. Schwartz, L. E. Carpenter, Attorney
Robert D. Mutch, Jr., L. E. Carpenter, Wehran Engineering

At the meeting L. E. Carpenter discussed a modified plan for the implementation of corrective measures at the waste disposal site. The new proposal was as follows:

1. Waste characterization study - Wehran Engineering is to conduct a waste characterization survey which would be representative of the material in the disposal area. Mr. Mutch explained that this project was initiated on July 16, 1979. When questioned about the sampling procedure it was explained that only one sampling point was used. Both Mr. Mutch and Mr. Jarrett believed that due to the method of waste disposition at the site, gravity flow of waste sludge from one point of discharge, that the area is a homogenous mixture. When questioned about the disposal period Mr. Jarrett indicated approximately 1968 to 1970. A copy of the analysis is to be sent to DEP. The analysis should be available in approximately three (3) to four (4) weeks.

2. Formulation of Waste Removal Plan by Wehran Engineering - Approximately four (4) to five (5) weeks after the waste characterization study a plan for removal of the waste that is visually detectable is to be submitted to L. E. Carpenter. When questioned about the installation of monitoring wells both Mr. Schwartz and Mr. Singleton contended that they were not needed at this time because the decision had been made to remove the waste. After a lengthy discussion on the necessity of monitoring the groundwater prior, during and after waste removal, the Company's position remained the same. In reference to the installation of monitoring wells after the waste is removed Mr. Singleton indicated that if it is required some monitoring may be included by Mr. Mutch in the Wehran report.

RECEIVED
AUG 13 1979

State of New Jersey
Department of Environmental Protection
Division of Water Resources

346275



3. Removal of waste material - Although no specific details could be given the following generalized sequence was indicated by Mr. Mutch.

- a) removal of waste from disposal area.
- b) rehabilitation of area with clean fill
- c) relocate tank storage farm to rehabilitated area.
- d) removal of waste in the area of the existing tank farm.
- e) rehabilitation of area with clean fill. There was an indication that the company may possibly want to expand and build in this area.

Also discussed was the present problem of the 55 gallon waste drum disposal. The following information was provided:

1. The number of drums presently stored on site is approximately 420 to 430.
2. Approximately 80 drums are ready to be scavanged by Newco.
3. Earthline is presently assessing the waste material for disposal considerations.

The delay in this disposal operation is due to the requirement of no more than 15% free liquid in the drums. The present method of decanting each drum to meet this requirement is very labor intensive. Mr. Singleton indicated that this is one of the considerations Earthline is assessing.

DISCUSSION

L. E. Carpenter has taken the position of removal of the waste material (visual core) as soon as a plan is developed by Wehran Engineering without any prior monitoring of the groundwater. The DEP maintained that prior monitoring was an important part of the overall cleanup and requested its inclusion in the program several times. The only concession to this by Mr. Singleton was the possibility of including some limited monitoring after the waste was removed.

INTERIM SUBMITTAL

Mr. Mutch is to submit a summary of the present measures undertaken by Wehran Engineering concerning the cleanup of the disposal area. When the analysis of the waste sampled on July 16, 1979 becomes available a copy is to be sent to the DEP.

ENFORCEMENT ACTION

All pertinent avenues of enforcement should be reassessed due to the Company's change in attitude regarding the elimination of an initial ground-water monitoring program.

A4:G19